

In The Matter Of:

*Cynthia K. Payne v.
Glaxosmithkline*

*Beth Tench
May 23, 2002*

*Brusilow & Associates
1926 Arch Street
1st Floor West
Philadelphia, PA 19103-1404
(215) 977-9700 FAX: (215) 977-9773*

*Original File 0523022.V1, 96 Pages
Min-U-Script® File ID: 1882586720*

Word Index included with this Min-U-Script®



[1] Q: Who is the they that discovered the
[2] error?

[3] A: I'm not sure who discovered it. I don't
[4] recall.

[5] Q: And you assume that everybody got the
[6] wrong materials?

[7] MR. GUFFEY: Object to the
[8] form.

[9] THE WITNESS: We made a
[10] decision to send everyone a new
[11] manual in the event we didn't
[12] know.

[13] So, we were in our solution
[14] mode, let's fix this. So, we sent
[15] everyone a new manual. There
[16] could potentially be people, but
[17] we had no way of knowing and it
[18] could have taken days.

[19] BY MR. ABEL:

[20] Q: Potential people what?

[21] A: Who had the old manual.

[22] MR. GUFFEY: You're saying
[23] manual.

[24] THE WITNESS: I mean

Glaxosmithkline

Page 58

[1] workbook.

[2] **BY MR. ABEL:**

[3] **Q:** When you say there could potentially be
[4] people who had the old workbook, didn't you know
[5] by virtue that there was a problem that's at
[6] least one person had the old workbook?

[7] **A:** But it didn't come to our attention for
[8] quite a while.

[9] **Q:** So, it really sounds like it came to your
[10] attention through someone like the printer or
[11] somebody who was not taking the test?

[12] **A:** I don't know that.

[13] **MR. GUFFEY:** Object to the
[14] form.

[15] **THE WITNESS:** Yes, I don't
[16] know that. I don't know that.

[17] **MR. GUFFEY:** You didn't know
[18] the number of people who may or
[19] may not have gotten the original
[20] material?

[21] **THE WITNESS:** Correct.

[22] **BY MR. ABEL:**

[23] **Q:** Well, as you sit here now, do you think
[24] it was everybody, nobody, or 10 percent or

95

Beth Tench - 5/23/02
Payne v GSK

SIGNATURE PAGE

I hereby acknowledge that I have read
the foregoing transcript dated May 23, 2002, and
the same is a true and correct transcription of
the answers given by me to the questions
propounded, except for the changes, if any,
noted on the Errata Sheet.

SIGNATURE:

Beth D. Tench

DATE:

10/10/02

Brusilow & Associates
(215) 977-9700

96

Beth Tench - 5/23/02
Payne v GSK

ERRATA SHEET

	4 PAGE	22 LINE	Allyssa CORRECTION
5	5	7	East Tennessee State University
6	6	17	LaJolla, California
7	7	2	LaJolla, California
8	7	12 & 13	LaJolla, California
9	10	17	December of 1997
10	22	14	Tom Rotterman
11	42	7	from December of 1997 until July of 2001
12	45	24	Clinical Trials
13	54	22	50
14	59	17	guts
15	64	8	legal (not clinical)
16	70	22	Tom Rotterman
17	83	12	July 2001

Brusilow & Associates
(215) 977-9700